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.April 6, 2010

Ms. Marlene Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

Re: IPCO LLC – Ex Parte Notice
Implementation of the Telecommunications Act of 1996: Commercial
Availability of Navigation Devices – CS Docket No. 97-80
Evolution Broadband’s Request for Waiver of Section 76.1204(a)(1)
of the Commission’s Rules – CSR-7902-Z

Dear Ms. Dortch:

On April 5 and April 6, 2010, representatives of IPCO LLC and the undersigned met with members of the Commissioners’ and Media Bureau staffs to present in support of the pending petition for reconsideration filed by Public Knowledge of the MO&O in Evolution Broadband, LLC, FCC 09-46; CS Docket No. 97-80; CSR-7902-Z (Rel. June 1, 2009).

FCC personnel present were Ms. Rosemary Harold, Mr. Joshua Cinelli, Ms. Millie Kerr, Mr. Brad Gillam, Mr. Rick Kaplan, Mr. Brendan Murray, Ms. Mary Beth Murphy, Mr. Steve Broeckaert, Ms. Alison Neplokh, Mr. Brendan Murray, Ms. Nancy Murphy and Mr. Bill Lake. Mr. John Bergmayer of Public Knowledge was present with IPCO and Media Bureau staff.

IPCO personnel present were Mr. Jim Gee, Mr. Rod Harrison, and Mr. Tony Austin. In addition, present with IPCO in front of Ms. Millie Kerr, Mr. Brad Gillam and Mr. Rick Kaplan was Mr. Christophe Perini of Xcrypt, Inc. In addition, Mr. Marc Cohen of Avail-TVN was present at the meeting with Mr. Kaplan.

IPCO presented its line of HD DTA navigation devices compliant with the integration ban of section 629 of the Act and section 76.1204(a)(1) of the regulations. Topics discussed were IPCO’s successful introduction of its devices

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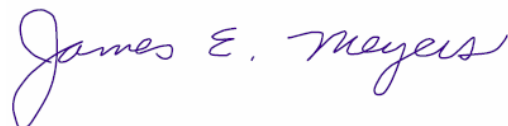
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Q1, 2010, at the National Cable Television Cooperative Winter Education Conference, portability, pricing, assigning cost of the security component (the card) separately from the navigation device, distribution to consumer electronics outlets and cable operators, Cable Labs certification, incremental steps to migrate towards a single interface, the inhibiting effect of the integration ban waivers and the MO&O on the availability of low and mid-priced compliant navigation devices, other new entrants coming online with low-cost compliant devices, and the ubiquity of IPCO's devices to work with various cable cards in the U.S. and other security modules outside of the U.S.

Attached is a description of IPCO's Transport Digital Migration System shown to Mr. Kaplan, Mr. Gillam and Ms. Kerr.

Very truly yours,



James E. Meyers
Counsel for IPCO, LLC

Attachments

cc w/enc. To all present; Ms. Sherrese Smith

TRANSPORT DIGITAL MIGRATION SYSTEM

Digital Migration made Affordable and Simple

For many years the cable television industry did not change much. But those days are gone, likely never to return. For an operator to survive, he must provide the HD programming, innovative services and fast data speeds customers expect. Many small to mid sized operators have found that the cost of upgrading their limited bandwidth systems to stay competitive is cost prohibitive. Our **Transport Digital Migration System** provides these operators an *alternative* solution that they can easily afford. It includes:

- Complete ARRIS digital headend upgrade starting at \$25,000
- HD DTAs for less than \$75
- Dual Tuner DVRs for less than \$250
- Separable security module from Comvenient only required for premium service subscribers

The ARRIS Digital Headend System

We are pleased to team with ARRIS (www.arrisi.com) to introduce a customized solution that incorporates their D5 Multiplexing Edge QAM and HEMi integrated multi-channel encoder, multiplexer, modulator and upconverter. This system has been designed to streamline the conversion of an analog headend to digital, and to tightly integrate with the Transport DMS DTAs and DVRs.

The Comvenient Conditional Access System

Comvenient (www.comvenient.com) has been an innovative and effective CA system internationally since 1996. We are pleased to bring their powerful CA system to the U.S. cable market. The Comvenient CA system is:

- Secure—it provides the CA platform you need to provide premium programming.
- Affordable—you only need to purchase and deploy their separable security module for customers who pay for premium services, not for basic tier subscribers.
- Compliant—separable security to comply with the *integration ban*
- “Operator friendly”—amazingly manage the CA system’s features with their excellent user interface
- Flexible—easily integrates with most billing systems

The Digital Migration Process

The **Transport DMS** includes typical installation costs! The ARRIS headend equipment can usually be installed quickly; but how fast a system should migrate to digital programming will depend upon several factors including the number of subscribers and the number of available free channels. Make an appointment with one of our specialists to develop a customized plan for your digital migration.

TRANSPORT DMS

DTAS AND DVRS

Features of all TRANSPORT DMS models:

- All-digital HD 1080i/1080p
- Easy Setup Guide installation
- 32-bit RISC architecture
- Parental Control features
- Favorite and last channel recall
- 32, 64, 128, & 256 QAM Constellation
- MPEG 1 audio 32, 44.1 & 48 KHz
- Easy-to-use on screen menu (OSM)
- Full Picture-in Graphic (PIG) function
- Multi-language menu
- Full EPG with search features
- SD and subtitles supported
- MPEG 2 & MPEG 4 AVC/H.264 HP@L4
- Remote, manual, and AC cord included

Optional on all TRANSPORT DMS models:

- White label branding
- Dolby AC-3
- Silver or black
- Separable security module

TRANSPORT DMS 2000



- HD DTA for less than \$75
- 250 x 44 x 154 mm



- HDMI, RF and Composite outputs

TRANSPORT DMS 4000



- Dual Tuner DVR for less than \$250
- HDD options of 500GB and 1 TB
- Time shifting recording of 8 hours
- HDMI, RF, composite & component outputs



- MP3 Player
- JPEG slide show
- USB Host V2.0
- 375 x 50 x 230 mm